

The Honorable Robert S. Lasnik and
The Honorable Ricardo S. Martinez

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UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

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CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES OF AMERICA,
Plaintiff,
v.
MUHAMMAD FAHD and
GHULAM JIWANI,
Defendants.

No. CR17-0290RSL
NOTICE OF RELATED CASES
(FILED UNDER SEAL)

UNITED STATES OF AMERICA,
Plaintiff,
v.
KYRA EVANS,
Defendant.

No. CR18-0251RSM
NOTICE OF RELATED CASES
(FILED UNDER SEAL)

UNITED STATES OF AMERICA,
Plaintiff,
v.
DEVAUGHN WOODS,
Defendant.

No. CR18-0254RSL
NOTICE OF RELATED CASES
(FILED UNDER SEAL)

1 UNITED STATES OF AMERICA,

2 Plaintiff,

3 v.

4 MARC SAPATIN,

5 Defendant.

No. CR18-0255RSL

NOTICE OF RELATED CASES

(FILED UNDER SEAL)

6
7 Comes now the United States of America, by and through Annette L. Hayes,
8 United States Attorney for the Western District of Washington, Andrew C. Friedman and
9 Francis Franze-Nakamura, Assistant United States Attorneys for said District, and,
10 Anthony Teelucksingh, Trial Attorney with the Computer Crime & Intellectual Property
11 Section of the United States Department of Justice, and files this Notice of Related Cases,
12 pursuant to Local Rule CrR 13(b).

13 The four cases listed in the caption are related cases and involve common
14 questions of law and fact. *United States v. Muhammad Fahd & Ghulam Jiwani*, No.
15 CR17-0290RSL, charges Muhammad Fahd and Ghulam Jiwani with orchestrating a
16 scheme in which they paid more than \$1,000,000 in bribes to AT&T Mobility LLC
17 ("AT&T") employees, including Kyra Evans, DeV Vaughn Woods, and Marc Sapatin, to
18 unlock more than 2,000,000 cellular telephones, including by installing malware on
19 AT&T's computer systems to unlock the telephones. (Unlocking cellular telephones
20 permits the cellular telephones to be used on any telephone network. Customers whose
21 cellphones are unlocked may switch cellular telephone carriers, and could stop making
22 payments they agreed to make when they purchased their cellphones under
23 (1) installment plans, or (2) service plans that subsidized the cost of the purchase of the
24 cellphones.)

25 The bribed (and now former) AT&T employees, that is, Evans, Woods, and
26 Sapatin, are cooperating with the Government. Each has pled guilty to an information
27 and each has entered into a cooperation agreement with the Government. Each is
28 expected to testify at trial against Fahd, who has been arrested in Hong Kong, and who is

1 pending extradition, in the event that Fahd chooses to go to trial.¹ The cases of two
 2 cooperators – Woods and Sapatin – have been assigned to Judge Lasnik, who also was
 3 assigned the earliest filed of these related cases, the case against Fahd and Jiwani. *See*
 4 *United States v. DeV Vaughn Woods*, No. CR18-0254RSL and *United States v Marc*
 5 *Sapatin*, No. CR18-0255RSL. The case of the third cooperating witness – Kyra Evans –
 6 is the only case that has fallen to another judge and was assigned to Judge Martinez. *See*
 7 *United States v. Kyra Evans*, No. CR18-0251RSM. Because all of these cases involve
 8 common questions of law and fact, the Government believes there may be good reason
 9 for these cases to be assigned to a common judge, pursuant to Local Rule CrR 13(a).

10 DATED: this 16th day of November, 2018.

11 Respectfully submitted,

12 ANNETTE L. HAYES
 13 United States Attorney

14
 15 /s/ Andrew C. Friedman
 16 ANDREW C. FRIEDMAN
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 28 ¹ Fahd's co-defendant, Jiwani, also was arrested in Hong Kong. Jiwani waived
 extradition but passed away while still in Hong Kong custody.

/s/ Anthony Teelucksingh

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